

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

IN RE:	)	IN BANKRUPTCY
	)	
DAVID R. FACCONE,	)	CASE NO. 20-81450
	)	
DEBTOR.	)	CHAPTER 7

**NOTICE OF TRUSTEE'S OBJECTION TO DEBTOR'S AMENDED CLAIM OF EXEMPTIONS**

**PLEASE TAKE NOTICE** that on the 6<sup>th</sup> day of January, 2021, at 11:00 a.m., I will appear before the Honorable Judge Lynch, or any judge sitting in that judge's place, and present the Trustee's Objection to Debtor's Amended Claim of Exemptions, if you wish to receive a copy of the same, please contact our office by email at [natalelaw@bjnatalelaw.com](mailto:natalelaw@bjnatalelaw.com) or by phone at 815-964-4700.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 291 5226 and the password is 852255. "The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

BERNARD J. NATALE  
By: /s/ BERNARD J. NATALE  
Bernard J. Natale  
1639 N. Alpine Road, Ste 401  
Rockford IL 61107

**CERTIFICATE OF SERVICE**

I, Mary Jane D'Angelo, declare under penalty of perjury under the laws of the United States of America that I served a copy of this Notice and Objection on each entity shown on the attached list at the address shown and by the method indicated on the list on January 6, 2021.

**List of Parties Served:**

Steven J. Brody, Attorney for Debtor (ECF)

Office of the U.S. Trustee (ECF)

Nathan E. Curtis, Attorney for Creditor, Doris M. Geraci (ECF)

PREPARED BY:

ATTORNEY BERNARD J. NATALE  
BERNARD J. NATALE, LTD.  
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SUITE 401  
ROCKFORD, IL 61107  
(815) 964-4700

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<b>IN RE:</b>	)	<b>IN BANKRUPTCY</b>
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<b>DAVID R. FACCONE,</b>	)	<b>CASE NO: 20-81450</b>
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<b>DEBTOR(S)</b>	)	<b>CHAPTER 7</b>

**TRUSTEE'S OBJECTION TO DEBTOR'S AMENDED CLAIM OF EXEMPTIONS**

Now COMES Bernard J. Natale, and for his objection to the Amended Claim of Exemption, filed by the Debtor, David R. Faccone, as Docket No. 52, and objects to the Debtor's amended claim of exemption in the following described property and for the following reasons:

1. The Debtor filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code on August 13, 2020.
2. At all relevant times herein, Bernard J. Natale has been the duly appointed, qualified, and acting trustee for the estate of the above named Debtor.
3. That Creditor, Doris M. Geraci, filed her objection to the amended claim of exemption, filed by the Debtor, David R. Faccone, as Docket No. 54 on or about December 30, 2020.
4. The Trustee hereby adopts and incorporates by reference the Objection to Claim of Exemptions, filed by Doris M. Geraci, under Docket No. 54, as that of the Trustee as set forth verbatim herein.

WHEREFORE, the Trustee prays that the Debtor's amended claim of exemption filed under Docket No. 52 by denied.

Dated: January 5, 2021



/S/ BERNARD J. NATALE  
BERNARD J. NATALE, TRUSTEE FOR THE  
ESTATE OF DAVID R. FACCONE

PREPARED BY:  
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